

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

In re:

Tonja Pye Means,

Debtor.

2120 SW Gooseberry Lane  
Lees Summit, MO 64082  
SSN: xxx-xx-2547

Case No.: 19-42464

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO  
DISMISS CASE (Document 158)**

**COMES NOW** Debtor, Tonja Means, by and through Counsel, Steven M. Long of The Sader Law Firm, and in response to the Trustee's Motion to Dismiss Case (Document 158) states as follows:

1. Debtor affirms the allegations contained in the first paragraph of the motion.
2. Debtor affirms the allegations contained in the second paragraph of the motion.
3. Debtor affirms the allegations contained in the third paragraph of the motion.
4. Debtor's current information for a Wage Order is as follows: **"Change Healthcare, 216 Centerview Dr #300, Nashville, TN 37219."**
5. Debtor will coordinate with counsel to schedule payments through TFS if her Wage Order does not swiftly commence.
6. Debtor is concurrently filing a Motion to Suspend Plan payments to resolve the default at issue.
7. Debtor has surrendered her cross-collateralized 2015 Equinox, which should resolve her current length issue.

**WHEREFORE**, for the foregoing reasons, Debtor prays this Honorable Court enter an Order Denying Trustee's Motion to Dismiss Case (Document 158), or any other relief this Court deems just and proper.

Respectfully submitted,

THE SADER LAW FIRM

By: /s/ Steven M. Long  
Steven M. Long, MO#60118  
2345 Grand Boulevard, Suite 2150  
Kansas City, Missouri 64108-2663  
Tel: 816-561-1818 | Fax: 816-561-0818  
Direct: 816-595-1810  
[slong@saderlawfirm.com](mailto:slong@saderlawfirm.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all parties in and others receiving electronic service through the U.S. Bankruptcy Court's **ECF** System and by First Class U.S. Mail, postage prepaid, on the parties requesting notice listed below on November 14, 2022.

/s/ Steven M. Long  
Steven M. Long, Attorney